



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 19 2008

OFFICE OF
ADMINISTRATION
AND RESOURCES
MANAGEMENT

Karen C. Hontz
Director
Office of Government Contracting
409 Third Street, SW
Mail Code 6510
Washington, D.C. 20416

Dear Mr. Collins:

In accordance with Executive Order 13360, I am pleased to submit the U.S. Environmental Protection Agency (EPA) fiscal year (FY) 2007 Annual Report on Service-Disabled Veteran-Owned Small Businesses (SDVOSB).

As reflected in the enclosed report, the EPA demonstrated its commitment to including SDVOSB in procurement opportunities by exceeding the 3% goal. The EPA awarded 4.1% of its procurement obligations, over \$55.2 million, to SDVOSB in fiscal year (FY) 2007.

Once again, we thank you for this opportunity to provide our Annual Report on the SDVOSB program. If you desire further information, please contact Ms. Corinne Sisneros, the EPA's Competition Advocate, at (202) 564-4321.

Sincerely,

A handwritten signature in black ink, appearing to read "Denise Benjamin Simons", is positioned above the printed name.

Denise Benjamin Simons
Director, Office of Acquisition Management

Enclosures:

EPA's FY 2007 Annual Report on Contracting with SDVB in accordance with E.O. 13360

cc: Jeanette Brown/EPA OSDDBU



U.S. Environmental Protection Agency
Fiscal Year 2007 Annual Report
Contracting with Service-Disabled Veteran-Owned Small Businesses

This report is submitted in accordance with Executive Order 13360, and is based on the format established by the U.S. Small Business Administration (SBA). The EPA is pleased to present this assessment of our performance, achievements, and future plans to continue increasing the number of contracts awarded to service disabled veteran-owned small businesses (SDVOSB), pursuant to Executive Order 13360.

The EPA demonstrated its commitment to including SDVOSB in procurement opportunities by exceeding the 3% goal and awarding 4.1% of its procurement obligations, over \$55.2 million, to SDVOSB in fiscal year (FY) 2007.

The EPA's strategic plan reflects the Agency's commitment and aggressive efforts to award contracts to SDVOSB. In fact, the EPA was honored when SBA not only approved our implementation strategy in July 2005, but further praised it as "a model for other Federal Agencies to emulate."

The EPA's success in awarding more than one-third of our total contract dollars annually to small businesses is due in no small part to our dynamic real-time **Forecast Database**, which is on the Internet at: <http://www.epa.gov/oam/>. The **Forecast Database** contains detailed information on current and future procurement opportunities, including the contact person, due dates, statement of work, and all other relevant information. The EPA's Forecast Database equips small businesses interested in doing business with the EPA with the information they need to effectively compete for EPA contracts.

To demonstrate the EPA's continued efforts in support of small businesses, the following chart shows the EPA's increasing awards to small businesses from FY 2006 to FY 2007.

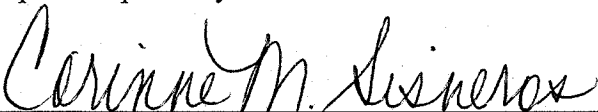
Category	FY 2006	FY 2006		FY 2007	FY 2007	
		FPDS-NG			FPDS-NG	
	Goals	\$	%	Goals	\$	%
Total Dollars		\$1.7B			\$1.4B	
Small Business	36.0%	\$678.6M	39.81%	36.0%	\$536.6M	39.4%
Small Disadvantaged Business (SDB) incl. 8(a)	10.5%	\$169.6M	9.95%	10.5%	\$201.8M	14.8%
8(a) Firms Only	7.5%	\$97.0M	5.69%	7.5%	\$112.2M	8.2%
Women-Owned Small Businesses (WOSB)	5.5%	\$ 74.5M	4.37%	5.5%	\$72.2M	5.3%
HUBZone Certified by SBA	3.0%	\$ 32.1M	1.88%	3.0%	\$32.6M	2.4%
Service-Disabled Veteran-Owned Sm. Business	3.0%	\$18.3M	1.07%	3.0%	\$55.2M	4.1%

If you have any questions concerning this report, please contact Ms. Corinne Sisneros, EPA's Competition Advocate, at (202) 564-4321 or by e-mail at sisneros.corinne@epa.gov.

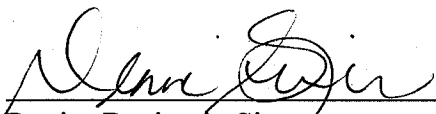
Part 1 – Agency Information


U.S. Environmental Protection Agency
Stephen L. Johnson, Administrator
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Report Prepared by:


Corinne M. Sisneros, Competition Advocate
Office of Acquisition Management
Phone: (202) 564-4321 E-mail: sisneros.corinne@epa.gov
8/19/08
Date

Report Concurred by:


Denise Benjamin Sirmons
Senior Procurement Executive
Director, Office of Acquisition Management
Phone: (202) 564-4310 E-mail: benjamin-sirmons.denise@epa.gov
8/19/08
Date


Jeanette L. Brown
Director, Office of Small and Disadvantaged Business Utilization
Phone: (202) 566-2075 E-mail: brown.jeanettel@epa.gov
08/19/08
Date

Part 2 – EPA’s Strategy to increase awards to SDVOSB

The following information explains the EPA’s strategies that were implemented to increase awards to service-disabled veteran-owned small businesses (SDVOSB).

On January 11, 2006, the EPA issued the Agency’s strategy, with a plan to manage and measure our achievements toward our strategy commitments. The EPA is committed to including SDVOSB in procurement opportunities. The EPA’s strategy includes commitments from all of the program offices in the Agency.

The Office of Administration and Resources Management (OARM) is the lead office for the Agency’s SDVOSB contracting strategy, and the Office of Acquisition Management (OAM) and the Office of Small Business Programs (OSBP) are responsible for coordinating specific action items.

Throughout the year, the EPA has actively carried out the implementation strategy in a number of different ways. The following are the highlights of our accomplishments:

- All of the EPA’s Assistant Administrators and Regional Administrators have designated a responsible official to ensure their acquisition plans support the SDVOSB contracting goal. They also are accountable for success since this responsibility was added to their performance plans.
- OAM and OSBP worked to ensure that SDVOSB are included in the program acquisition plans and that specific procurement opportunities are identified for SDVOSB.
- OAM and OSBP review each new procurement opportunity for possible SDVOSB competition.
- OAM conducted annual customer service visits with the EPA’s Senior Resource Officials, and addressed the issue of SDVOSB contract opportunities at each customer service visit. During each visit, OAM further reiterated the importance of each program’s support to achieve the Agency’s SDVOSB goal.
- In 2006, the EPA created an internal small business performance measure under the Government Performance and Results Act (GPRA) to increase the EPA percentage of contract dollars awarded to SDVOSB. Four program offices at the EPA Headquarters participated in this initiative in the second half of FY 2006. Six program offices and four Regions participated in FY 2007. For FY 2008, all Headquarters program offices and all Regions are participating. In an effort to promote the small business program, OSBP took aggressive steps to publicize the program both internally and externally. For example, OSBP provides the Agency’s senior leadership OAM supplied data to track the small business performance of their office. OSBP created an internal recognition

program which provides visible quarterly recognition for those offices meeting their targets. In addition, each fall, OSBP spearheads the Annual Administrator's Small Business Awards Ceremony which recognizes the top performing small businesses and the top performing program offices, Regions, and individual employees.

Part 3 – Technical Assistance for SDVOSB

The EPA has a Fact Sheet for SDVOSB on using the Forecast Database to identify procurement opportunities at the EPA. The EPA shared the Fact Sheet with the Association of Service Disabled Veteran-Owned Small Businesses to demonstrate how to find procurement opportunities at the EPA. The EPA also held Contractor Forums in October 2007 and June 2008, where SDVOSB participated. At the October 2007 Contractor Forum, the EPA procurement and program personnel and the EPA's top prime contractors held one-on-one counseling sessions for small businesses, including SDVOSB. The EPA procurement and program personnel provided information to companies about upcoming procurement opportunities and provided details about doing business with the EPA. The prime contractors provided details on work they perform for the EPA and discussed potential subcontracting opportunities.

In addition, the EPA's outreach to SDVOSB includes conferences throughout the nation, including conferences in Washington, D.C., Maryland, Virginia, Ohio, California, Nevada, and Illinois. The EPA has been awarded the Annual Federal Champions Award by the Center for Veterans Enterprise under the Department of Veterans Affairs for meeting and exceeding the 3% statutory contract requirement for SDVOSB.

OSBP has provided one-on-one counseling sessions with numerous SDVOSB throughout the year. OSBP, with the assistance of OAM, also conducts an annual counseling session for SDVOSB with information related to upcoming procurement opportunities, and subcontracting opportunities with the Agency. The objective of this event is to assist the SDVOSB in doing business with the EPA.

Part 4 – Procurement Training on the SDVOSB Program

The EPA continues to educate the EPA procurement community on the SDVOSB program. The EPA conducted a training session on the SDVOSB Program at the Contract Customer Relations Council (CCRC) meeting, which is a regular monthly meeting between procurement policy and program offices on procurement issues. At this meeting, the EPA procurement personnel and OSBP provided SDVOSB program information to EPA personnel, including information on tools for identifying SDVOSB and the application of the new SDVOSB procurement rules.

The EPA issued a Fact Sheet to all program offices, contracting personnel, and regional coordinators on the available SDVOSB set-aside and sole-source procurement options, along with market research tips to identify more opportunities for SDVOSB.

The OSBP Director held small focus group meetings with SDVOSB to address their issues and concerns and also gave them a more focused insight into doing business with the EPA.

The EPA held training for contracting personnel on the available SDVOSB set-aside and sole-source procurement options, along with market research tips to aid them in matching more procurement opportunities for SDVOSB.

The EPA also modified its training courses for program personnel to include information on the SDVOSB Program.

Part 5 – EPA’s Subcontract Strategy for SDVOSB

The EPA’s Agency SDVOSB Strategy includes the requirement to meet the SDVOSB subcontract goal of 3%. The EPA includes a minimum 3% SDVOSB subcontracting goal in all contracts that require a subcontracting plan. The EPA contracting officers are reviewing, questioning, supporting, and enforcing subcontracting plan commitments.

At the EPA’s Contractor Forums in October 2007, and June 2008, speakers discussed the importance of the SDVOSB program as well as the EPA’s commitment to contracting and subcontracting to SDVOSB.

Part 6–Impact Statement

The EPA demonstrated its commitment to including SDVOSB in procurement opportunities by exceeding the 3% goal and awarding 4.1% of its procurement obligations to SDVOSB in fiscal year (FY) 2007.

Part 7 – Future Efforts for SDVOSB Goal

The EPA plans to continue our aggressive SDVOSB Strategy to ensure that the Agency continues to identify opportunities for SDVOSB.

The Director of OAM will continue to meet with all Senior Resource Officials to discuss their SDVOSB future procurement opportunities to help the Agency meet or exceed the SDVOSB 3% goal.

The Director of OSBP has identified the EPA’s top three program offices, i.e., Office of Solid Waste and Emergency Response (OSWER), Office of Research and Development (ORD), and Office of Air and Radiation (OAR), to discuss specific initiatives that have the highest procurement obligations under those programs. Focusing on those contracting opportunities will better enable EPA to achieve the 3% prime contract goal for SDVOSB.

Part 8 – Recommendations

To continue with our successful efforts in awarding contracts to SDVOSB, the Office of Acquisition Management (OAM) recommends that FAR 19.800 be amended to authorize agencies to take a requirement out of the 8(a) program to set it aside for SDVOSB competition if:

- The incumbent 8(a) firm has graduated from the 8(a) program;
- The Agency has exceeded its 8(a) goal;
- The Agency has not achieved its SDVOSB goal;
- Market research indicates that there are at least two qualified SDVOSB capable of performing the requirement.

This change would allow similar treatment as requirements under the Ability One (formerly JWOD) program, except that the SDVOSB requirements would remain with a small business.

Conclusion

Thank you for the opportunity to describe the EPA's efforts and future plans to contract with SDVOSB.

If you have any questions on this report, please contact Ms. Corinne Sisneros, EPA's Competition Advocate, at (202) 564-4321 or by e-mail at sisneros.corinne@epa.gov.

Small Business Administration
Scorecard Plan
for
Fiscal Year 2009

Agency: U.S. Environmental Protection Agency

Office: Office of Small and Disadvantaged Business Utilization

Date: August 28, 2008

PLAN (*RIGHT SIDE OF SCORECARD*)

For the First Scorecard of the Fiscal Year, to be issued during the second quarter, responses to each of nine elements will be evaluated regarding the small business program *plan* for the fiscal year. For each of the three factors, the evaluator will score either a "1" for a positive response or a "0" as a negative or non-applicable response.

An overall evaluation will be characterized as follows: Scores ranging 0 to 7.2 will be deemed 'Red,' scores ranging from 7.3 to 8.9 will be deemed 'Yellow,' and Scores of 9.0 will be deemed 'Green.' Note that standard rounding conventions will be observed in calculating scores.

Evaluation Measure #1 (First Scorecard – Plan)
Implemented strategic plan to increase the number of <i>competitively</i> awarded contracts to small businesses during the period
How will SBA evaluate response?
The agency will need to clearly define and document a strategy to increase competitive opportunities under procurement preference programs. Examples: <ul style="list-style-type: none">• Schedule showing an outreach calendar of events, such as vendor outreach session for specific preference groups (e.g. women-owned small business, service disabled veteran owned small business, HUBZone, etc.)• An annual or multi-year plan to increase the number of competitively awarded contracts to small businesses during the period
<ul style="list-style-type: none">• Yes or No? _____ Agency clearly defined and documented a strategy to increase competitive opportunities under procurement preference programs.
Brief Agency Comment for Scorecard:
EPA's strategy to increase the number of competitively awarded contracts to small businesses is a continuation of a successful model of cooperation and collaboration within the Agency that has proven to be fruitful as evidenced by the marked increase and progress of our socio-economic accomplishments.

The Agency has a far reaching and all inclusive approach to small business that does not stop with the Office of Small Business Programs (OSBP). With commitment from the Administrator and the Deputy Administrator, EPA's Office of Small Business Programs (formerly the Office of Small and Disadvantaged Business Utilization) continues to work collaboratively with the EPA's Office of Acquisition Management (OAM) and the program offices to increase the number of competitively awarded contracts to small businesses. This collaboration includes teaming with OAM with the execution of the Agency's Annual Acquisition Forecast Call Memo (Call Memo) to program offices to provide a projection of their respective small business goals. The Call Memo signed by both the Directors of the Office of Acquisition Management and the Office of Small Business Programs demonstrates this collaboration and commitment to the Agency's small business initiatives. This Call Memo requires that the programs identify specific contract opportunities for small businesses and to include their anticipated small business performance measurements. These measures are provided as incremental percentage increases in each socioeconomic category. In FY 2009, OSBP and OAM will continue to work collectively to increase the number of competitively awarded contracts to small businesses by enhancing our Call Memo to add information to request each program office to provide a projection of its small business goals and identifying specific contract opportunities that will be set-aside. The acquisition forecast call memo will be issued by May 2009. OSBP will review the information submitted by the program offices in their acquisition forecast and compare the data against a three-year average and will negotiate increases with each office to ensure they forecast increasing competitively awarded contracts to small businesses from their past.

- 1) The Office of Small Business Programs publishes a calendar of events that is both internal and external to the Agency. Our office has a listing of our bi-monthly vendor outreach sessions on our website: www.epa.gov/osbp. Our vendor outreach sessions specifies the preference groups to include the month of March for Woman-Owned Small Businesses in commemoration of Women's History Month (**March 2009**) and November for SDVOSBs in honor of Veteran's Day (**November 2008**). OSBP sets aside vendor outreach for HubZone (**July 2009**) and environmentally-focused (Brownfields) small businesses (**October 2009**). Since our functional area has expanded, we have added HBCUs/MAIs (**September 2009**) to our outreach session schedule.
- 2) OSBP will continue to partner with OAM with its bi-annual Contractor's Forum's held in the fall (**Fall 2008**) at EPA's Washington headquarters and in the spring (**Spring 2009**) at one of the Agency's 10 Regional facilities. The intent is to bring both large and small businesses together for possible teaming and joint ventures as well as any number of other opportunities which may avail themselves. Additionally, the Agency's two major buying facilities in Cincinnati, Ohio and Research Triangle Park, North Carolina holds annual outreach sessions for small businesses, hosted by the resident small business specialist. A number of the Agency's program offices and Regions hold "vendor days" to give small businesses exposure to buying officials.
- 3) EPA will continue its very success internal strategy developed in FY2005 to implement E.O. 13360 to provide opportunities for SDVOSBs to increase their contracting and subcontracting opportunities at EPA. As noted above, EPA's outreach to SDVOSBs includes its annual small business outreach (**November 2008**). A Statement of Work is being drafted for at least two conferences to be held in FY2009, one on each coast for SDVOSBs interested in acquisition opportunities with EPA.

Evaluator Comments:

Brief SBA Comment for Scorecard:**Evaluation Measure # 2 (First Scorecard – Plan)**

Demonstrated top-level Agency commitment to small business contracting during the period.

How will SBA evaluate response?

The agency will need to have a documented expression of commitment to small business contracting at the agency-head, or deputy agency-head, level within the previous twelve months.

Examples:

- Affirmative public statements by senior level executives supporting award of contracts under socioeconomic procurement preference programs.
- Affirmative internal statements by senior level executives encouraging or mandating award of contracts under socioeconomic procurement preference programs.
- Inclusion of such commitment to award of contracts under socioeconomic procurement preference programs in strategic and/or operating plans, and/or annual individual performance work plans; etc.

- **Yes or No?** _____ Agency provided a documented expression of top-level agency commitment.

Brief Agency Comment for Scorecard:

EPA's small business programs have the commitment of the Administrator Stephen Johnson, Deputy Administrator Marcus Peacock and the Agency's senior leadership. EPA's top-level management has demonstrated a keen interest in the Agency's small business programs.

Examples include:

- 1) EPA's OSBP Director reports directly to EPA's Deputy Administrator Marcus Peacock. During these meeting strategies and issues are discussed regarding EPA's small business program. Discussions include the effectiveness of EPA's small business performance measures to increase the percentage of procurement dollars awarded to small businesses. This performance measure has had a positive impact on the percentage of awards made in all categories of small businesses, as the accomplishments under all socioeconomic categories have constantly improved since the inception of the performance measures.
- 2) The EPA Administrator has the "Administrator's Annual Small and Disadvantaged Business Awards Ceremony" in recognition of small business achievements by small businesses, EPA program and regional offices and senior leadership's commitment to the Agency's small business program. During this

ceremony the Administrator and other senior leadership from Headquarters and the Regions assemble to recognize the accomplishments and efforts of the program offices and those outstanding individuals and small businesses. OSBP is currently planning the 20th celebration this fiscal year to take place in **October 2009**.

- 3) The OSBP Director is included in the Administrator's weekly senior staff meetings. Following the release of each quarterly Small Business Goal Accomplishment Report, the Deputy Administrator discusses the program with EPA's senior managers at the Administrator's senior staff meetings.
- 4) The Agency's small business goals are included in the "Quarterly Management Report" – a short list of important Agency-wide programs and performance measures tracked by the Deputy Administrator.
- 5) The OSBP Director meets with the Agency's Deputy Chief of Staff on an ongoing basis. OSBP is actively involved in the Assistant Regional Administrators' (ARA) monthly conference calls, quarterly ARA meetings and other forums to further advance the program among the Agency's leadership. This includes attending regularly scheduled meetings and participating on conference calls with managers in the Superfund program.
- 6) The OSBP Director meets with the principals of the program offices and the Regional Administrators to discuss the small business initiatives highlighting their accomplishments and offering methods to improve their overall accomplishments. This has garnered their continued support for the program. The OAM Director also meets with the Senior Resource Officials (SROs) to discuss the program's acquisitions and the impact on the small business program.
- 7) EPA's OSBP has been collaborating with the Director of the Office of Human Resources to include acquisition language as applicable in the performance standards of appropriate personnel. Acquisition language regarding SDVOSBs is currently included in the performance standards of the Agency's senior leadership and cascades to appropriate program personnel with acquisition responsibilities. Small business language is included in the standards of the Agency's GS-1102 population both at headquarters and in the regions that they will support the small business programs and the Agency's socio-economic goals.
- 8) EPA's OAM Director will continue to conduct customer service meetings annually with each Senior Resource Official (SRO) and highlight the program's small business achievements and its importance to meeting the Agency's goals, as well as discussing ways to enhance small business participation in Agency acquisitions.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure # 3 (First Scorecard – Plan)

Planned significant events to increase small business participation in the procurement process during the period.

How will SBA evaluate response?

The agency will need to have enacted a comprehensive small business plan that includes written policies and procedures focused on improving the competitive environment and increasing small business participation in the procurement process.

Examples:

- Plans to sponsor relevant outreach events or educational activities.
- Plans to implement a relevant supplemental small business policy or procedure.
- Plans to work with SBA on small business matchmaking events for members of socioeconomic preference programs such as women-owned small businesses, service-disabled veteran-owned small businesses, and HUBZone certified firms.

- Yes or No? _____ Agency clearly enacted a comprehensive small business program

Brief Agency Comment for Scorecard:

In FY 2009, EPA plans to sponsor and exhibit at conferences and expos to increase small participation in the Agency procurement process. These include:

- 1) OSBP Counseling Sessions for FY 09 include: Woman-Owned Small Businesses (Mar 09), Hubzone Businesses (Jul 09), HBCU/MAIs (Sep 09), Small Environmental/Brownfield Businesses (Oct 08) and Serviced Disabled Veteran Owned Small Businesses (Nov 08);
- 2) This is only a partial list of the events EPA's OSBP will be participating in during FY 2009 since events come known throughout the year: Reservation Economic Summit & American Indian Business Trade Fair (RES 2009) (Mar 09), US Hispanic Chamber of Commerce, US Women's Chamber of Commerce (Mar 09), US Pan Asian American Chamber of Commerce (May 09), National Veterans Small Business Conference and Expo sponsored by DOD (Jul 09), local DC area and nationally sponsored SBA Matchmaking events, Congressionally-sponsored events, Med Week sponsored by the Dept of Commerce (Sep 09), Veterans Business Journal East Coast Conference (Sep 09);
- 3) Round table discussions with Woman-Owned Small Businesses and SDVOSBs;
- 4) EPA's regionally-based Disadvantaged Business Enterprise/Minority Business Enterprise/Woman Business Enterprise (DBE/MBE/WBE) Coordinators provides a list of small business activities and events that they anticipate participating or attending on a quarterly basis to OSBP; and

- 5) OAM will conduct two annual Contractor Forums. The Contractor Forums are designed to provide updates on pertinent contracting issues and to present future contracting opportunities. In addition, it provides an opportunity for industry and EPA to improve communications through the exchange of information. The attendees include industry large, medium and small businesses and allows for networking opportunities with EPA procurement and program officials. Contractor Forums for FY 2009 are scheduled for Fall and Spring.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 4 (First Scorecard – Plan)

Demonstrates that small business data is accurately reported in FPDS-NG during the period

How will SBA evaluate response?

The agency will need to have established and documented a plan to ensure that small business data is accurately reported in FPDS-NG.

Examples:

- Plan to verify and validate FPDS-NG data, pursuant to Office of Federal Procurement Policy Memorandum of March 9, 2007, entitled Federal Procurement Data Verification and Validation.
 - Plans to encourages businesses to update their CCR information to accurately reflect size and social-economic business status
- Yes or No? _____ Agency has established and documented a process to ensure that small business data is accurately reported in FPDS-NG.

Brief Agency Comment for Scorecard:

- 1) EPA's Office of Acquisition Management identifies incorrect or rejected data. When any incorrect or rejected data is identified, the Contracting Officer inputs a help desk ticket to get support to resolve the problem. OAM works to ensure all data is accepted. EPA has a process in our simplified acquisition system (SPEDI) to ensure that the correct data on all small business categories in the system is directly linked to the Central Contractor Registry (CCR) and the information of the firm in CCR is automatically populated in the FPDS-NG data to ensure accuracy of the data. Thirty days after the end of each quarter, OAM submits draft reports to the program offices for review, which has assisted in

improving the reporting of the data.

- 2) OAM will continue to work with the FPDS-NG Change Control Board (CCB) to obtain detailed program office reporting capability to monitor and verify office achievements.
- 3) As a major customer of the Army Corps of Engineers, EPA has held meetings with OFPP and the Army Corps of Engineers to identify any irregularities that impacts our procurement baseline. Meetings and the review of the system are on-going. EPA and USACE are drafting an MOU to outline the roles and responsibilities each will have in the proper coding of projects performed under interagency agreements.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 5 (First Scorecard – Plan)

Demonstrates that policies and procedures are in place to ensure compliance with subcontracting plans and attainment of subcontracting goals during the period

How will SBA evaluate response?

The agency will need to have established, documented, and enacted a systematic plan to enforce small business subcontracting plans and to meet subcontracting goals.

Examples:

- Plans to use the Electronic Subcontracting Reporting System (eSRS) to manage compliance with subcontracting goals and to ensure attainment of subcontracting goals.
- Plans to provide assistance and support to prime contractors to ensure compliance with subcontracting plans.

- Yes or No? _____ The Agency has established, documented, and enacted systematic plan to enforce small business subcontracting plans and to meet subcontracting goals

Brief Agency Comment for Scorecard:

EPA actively uses the eSRS system to ensure the appropriate approval and/or rejection of submitted data.

- 1) EPA's OSBP will continue to actively enforce the proper review of prime contractor's subcontracting plans. This includes ensuring compliance with the Agency's stated subcontracting goals. Those plans that do not meet or adhere to

the Agency's goals will be deemed unacceptable and returned to the Contracting Officer with a written analysis of the areas where the contractor fell short.

- 2) Contracting Officers have been instructed to electronically submit to OSBP a copy of each approved subcontracting plan. OSBP established a database of the subcontracting plans that allows our office to cross-check the approved subcontracting plans with the eSRS summary information submitted.
- 3) Each subcontracting plan reviewed by OSBP includes a reminder to the Contracting Officer to have the contractor "submit verification from the actual subcontractors performing the tasks and to provide the amount of work they are proposing under the requirement." Contracting Officers are advised to "monitor the total dollars expected to be subcontracted" and to include "the liquidated damages clause . . . in the forthcoming contract to cover periods where [the contractor] does not meet its goals."
- 4) The summary reports submitted via eSRS are compared with the information submitted in the approved subcontracting plans. Firms that submit summary reports not meeting our subcontracting goals as approved in the subcontracting plans will be rejected and informed of those specific socioeconomic categories they fail to meet. They will be asked to address the deficiencies and provide a plan of action.
- 5) OSBP will be meeting quarterly with the Office of Acquisition Management's point of contact for the Agency eSRS program to discuss issues and strategy. These meetings will occasionally include the SBA CMR assigned to EPA.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure # 6 (First Scorecard – Plan)

Demonstrated no unjustified bundling has taken place during the period

How will SBA evaluate response?

The agency will need to have established, documented, and enacted systematic action plans to be taken to ensure no unjustified bundling has taken place during the reporting period.

Examples:

- Plan to improve bundling activities review process.
- Plan to review FPDS-NG for all agency bundlings coded.

- Yes or No? _____ The Agency has established, documented, and enacted systematic actions to be taken to ensure no unjustified bundling has taken place during the reporting period.

Brief Agency Comment for Scorecard:

EPA's contract bundling policy as implemented by OAM is codified in Section 7.2 of the EPA Contract Management Manual (CMM) and aligns EPA procedures with the Federal requirements and includes a sample template documentation. It is included in the acquisition forecast memo. The policy states that "bundled acquisitions that are not identified in the procurement planning process may be delayed if they are discovered after the Procurement Initiation Notice (PIN) process." EPA's policy on contract bundling requires that bundling is considered very early in the acquisition planning phase. OSBP is required to be notified during the acquisition planning process (see 1 above) or as soon as the planned bundling becomes known, of all planned bundled acquisitions and is to be provided with supporting documentation. This applies to all Agency requirements whether they are processed through the Office of Acquisition Management or awarded by another Agency. When the formal acquisition planning process begins, bundled requirements should be identified in the acquisition plans.

For the FY2009 acquisition planning process, OSBP is working closely with OAM and the program offices to identify any bundling and/or ward off any potential bundling. Additional OSBP plans include:

- 1) Draft a Contract Bundling Checklist;
- 2) Meet with the Agency's Competition Advocate on a monthly basis to discuss strategies;
- 3) Meet quarterly with the junior resource officials (JROs), whose responsible for their respective program's acquisition; and
- 4) Partner and collaborate with the Office of Acquisition Management's Procurement Policy division to provide training to the contracting officer's of their respective role and responsibility regarding bundling.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 7 (First Scorecard – Plan)

Planned training to contracting staff/managers in executing small business/socioeconomic procurements during the period

How will SBA evaluate response?

The agency will need to have planned at least 1 training session for the reporting period.

Acceptable responses may include, but need not be limited to the following:

- Maintenance of educational Intranet sites on small business programs covering program direction, critical documents, links to laws, regulations, and external contracting tools and resources.
- Plans to implement small business program orientation and training especially focusing on socioeconomic procurement preference programs such as women-owned small business, service-disabled veteran-owned small business, and HUBZone certified firms.

Yes or No? _____ The Agency has planned training for contracting staff/managers in executing small business/socioeconomic procurements.

Brief Agency Comment for Scorecard:

OSBP has a robust and on-going training program that includes contracting and program personnel alike. This includes tailoring the sessions for the intended audience. If the training is geared to a specific program office, OSBP conducts a trend analysis of the program's annual small business expenditures by socio-economic category which includes expenditures also by the NAICS codes. OSBP provides guidance and counseling that point out any shortfalls and potential for small business opportunities.

In FY 2007, OSBP published the first edition of its Small Business Pocket Guide. This guide is distributed to contracting officers and program and project officers. OSBP provides training to contracting personnel and to the project officers at the Project Officers/Contracting Officers (POCO) conferences.

In FY 2009, OSBP will continue to:

- 1) Provide small business training at the annual POCO conference, sponsored by the cognizant program officers and contracting officers;
- 2) Provide small business training approximately six (6) times annually to include program offices and at least one (1) regional office;
- 3) Complete the on-line small business training module; and
- 4) Provide refresher small business training to the current 1102's and comprehensive small business training to new 1102s.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 8 (First Scorecard – Plan)

Planned to collaborate with SBA on formulation of small business procurement policy initiatives during the period

How will SBA evaluate response?

The agency will need to demonstrate its intent to collaborate with SBA on at least one small business procurement policy initiative during the reporting period.

Acceptable responses may include, but need not be limited to the following:

- Active participation in the Small Business Procurement Advisory Council in small business procurement policy discussions.

Yes or No? _____ The Agency has planned to collaborate with SBA on formulation of small business procurement policy initiatives during the period .

Brief Agency Comment for Scorecard:

- EPA is committed to working collaboratively with SBA. This includes Agency representation from the Office of Small Business Programs at the Small Business Procurement Advisory Council's (SBPAC) monthly meetings. EPA's Director of the Office of Acquisition Management, is an active member of the SBA Executive Committee for the SBA Scorecard. The Executive Committee was convened by SBA to solicit input from a cross-section of federal agencies on small business issues. As a committee member, she met with other members of the committee to review and comment on the FY 2009 draft Plan Matrix, dated 7/15/08.

Evaluator Comments:**Brief SBA Comment for Scorecard:****Evaluation Measure# 9 (First Scorecard - Plan)**

Agency submits by attachment copies of all strategic plans that became due to SBA during the reporting period

How will SBA evaluate response?

In order to receive credit for this element, the agency will need to have met 100% of deadlines for all required strategic plans and annual reports that were due to SBA, within the reporting period. (That is, from October 1, 2007 through the date of submission of the First Scorecard Report to SBA. See Attachment 6.

- Yes or No? _____ Agency has met 100% of deadlines for all required strategic plans and annual reports that were due to SBA

Brief Agency Comment for Scorecard:

EPA is timely in its submission of the appropriate reports and will continue to provide those reports as required by SBA: SDVOSB, SBIR, TICS and DIGS, contract bundling and Woman-Owned Small Business Progress Reports. Some reports that are required by SBA from the Agency are not under OSBP's direct purview. These include the SBIR annual report, the SDVOSB Annual Report and the "TICs & DIGS". However, OSBP works collaboratively with the cognizant offices to ensure that the reports are filed timely.

Evaluator Comments:**Brief SBA Comment for Scorecard:**